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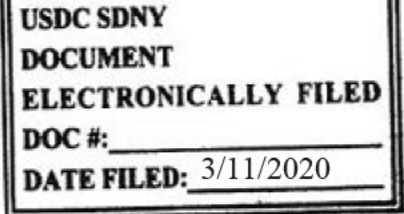
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March 11, 2020  
Counsel has affiliated with Jackson Lewis P.C., a Law Corporation

**VIA ECF & VIA Torres NYSDCHAMBERS@nysd.uscourts.gov**

The Honorable Analisa Torres  
United States District Judge  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, New York 10007

Dear Judge Torres:

**Re: Yovanny Dominguez v. CorePower Yoga, LLC**  
**Case No. 19-cv-10817 (AT)**

We represent Defendant CorePower Yoga, LLC in the above captioned matter. This letter is written pursuant to Rule 1(C) of Your Honor's Individual Practice Rules, to request an extension of discovery deadlines as set forth in the attached proposed amended case management plan. Counsel for Plaintiff, Bradly G. Marks, Esq., joins in this request.

The reason for this request is Plaintiff's Amended Complaint filed on Friday March 6, 2020, which Defendant intends to move to dismiss on March 20, 2020. Plaintiff's Opposition is due on April 3, 2020, and Defendant's Reply is due on April 10, 2020.

Meanwhile, the current deadline for depositions is less than two weeks later, on April 22, 2020. The parties are currently in the process of responding to document requests and interrogatories, and anticipate potential discovery disputes. The parties seek an extension of the deposition deadline from April 22, 2020 to June 8, 2020, and an extension of the fact discovery deadline from May 22, 2020 until July 8, 2020, with expert discovery to be conducted within 45 days thereafter.

We believe that the stay requested is for good cause in light of the anticipated motion to dismiss, the lack of prejudice to Plaintiff and the benefits of a stay to ensure the efficiency of the process. Thank you for your consideration.

GRANTED in part, DENIED in part.

The fact discovery deadline is extended to **June 26, 2020**. The expert discovery deadline is extended to **July 6, 2020**. The parties may move interim deadlines, including the deadline for depositions, without application to the Court. See ECF No. 17 ¶ 6.

The Clerk of Court is directed to terminate the motions at ECF Nos. 23 and 24.

SO ORDERED.

Dated: March 11, 2020  
New York, New York

  
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**ANALISA TORRES**  
United States District Judge